

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE
VITAMIN C ANTITRUST LITIGATION**

This Document Relates To:

*Animal Science Products, Inc., et al. v. Hebei
Welcome Pharmaceutical Co., Ltd., et al.,*
Case No. 1:05-CV-00453(BMC)(JO)
(E.D.N.Y.)

**MASTER FILE 1:06-MDL-1738
(BMC)(JO)**

**DEFENDANT CHINA
PHARMACEUTICAL GROUP
LTD.'S NOTICE OF MOTION AND
MOTION FOR DETERMINATION
OF FOREIGN LAW AND
JUDGMENT ON THE PLEADINGS
OR IN THE ALTERNATIVE
SUMMARY JUDGMENT**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendant China Pharmaceutical Group, Ltd. hereby moves this Court for a determination of foreign law and judgment on the pleadings or in the alternative summary judgment. This motion is made pursuant to Federal Rules of Civil Procedure 44.1, 12, and 56, and the Court's Scheduling Order of May 16, 2012. The motion is based upon this Notice of Motion and Motion, as well as the Memorandum of Law, Expert Report of Professor Fu Jun, and Local Civil Rule 56.1 Statement of Material Facts submitted herewith.

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Dated: September 28, 2012

Respectfully Submitted,
ZELLE HOFMANN VOELBEL & MASON LLP

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